

HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

KELLY L. MARTIN, an individual,

Plaintiff,

v.

AMERICAN AIRLINES, INC., a Delaware  
Corporation; and DOES 1 through 10,

Defendants.

Case No.: 2:20-cv-00735-RAJ

DECLARATION OF DEBRA SHAFFER  
RE: AMERICAN AIRLINES' MOTION  
TO TRANSFER VENUE FOR THE  
CONVENIENCE OF PARTIES AND  
WITNESSES

I, Debra Shaffer declares and says:

1. I am over the age of 18. I am competent to testify. I make this declaration based on personal knowledge.

2. I am employed as a Senior Claims Analyst at American Airlines, Inc. In my employment capacity, I have access to and regularly utilize the corporate records relied upon for purposes of making this declaration.

3. In the course of searching for additional documents to supplement American's responses to Plaintiff's discovery requests, American identified an error in the prior declaration of Robert Fraga (Dkt. #19) regarding the location information of two of the flight attendants on the subject flight, American Airlines Flight 767 from Seattle to Philadelphia, departing on May 9, 2018.

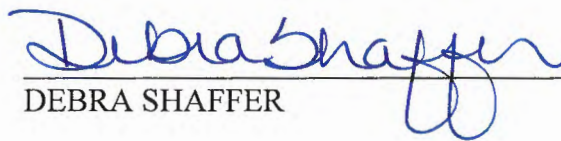
4. The four flight attendants were Luke Kenmore, David Eason, John Soto, and Kimberly Rocco. They were all based in Philadelphia at the time of the subject flight.

5. As of the date of this declaration:

- Flight Attendant Kenmore resides in Las Vegas, Nevada and is now based in Los Angeles.
- Flight Attendant Eason resides in Houston, Texas and remains based in Philadelphia.
- Flight Attendant Soto resides in Converse, Texas and is now based in Dallas/Fort Worth.
- Flight Attendant Rocco resides in Pittsburgh, Pennsylvania and remains based in Philadelphia.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED at Fort Worth, Texas this 1st day of October 2020.

  
DEBRA SHAFFER